December 18, 2006

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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OKLAHOMA



STATE OF OKLAHOMA, et al.,)

Plaintiffs,)

vs.) No. 4:05-CV-00329-TCK-SAJ

TYSON FOODS, INC., et al.,)

Defendants.)

DEPOSITION OF DEAN COUCH
TAKEN ON BEHALF OF THE DEFENDANTS
ON DECEMBER 18, 2006 AT 9:40 AM
IN OKLAHOMA CITY, OKLAHOMA

APPEARANCES:

MS. D. SHARON GENTRY, Riggs, Abney, Neal, Turpen, Orbison & Lewis, 501 North Broadway, Suite 101, Oklahoma City, Oklahoma 73118 appearing on behalf of the Plaintiff.

MR. J. TREVOR HAMMONS and MR. ROBERT D. SINGLETARY, Office of the Attorney General, 4545 North Lincoln Boulevard, Suite 260, Oklahoma City, Oklahoma 73105-3488 appearing on behalf of the Plaintiffs.

(Appearances continued on Page 2)

Reported By: Jody Graham, CSR, RPR, RMR, CRR

STATE OF OKLAHOMA v. TYSON DEAN COUCH

December 18, 2006

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1 TH request. I B A I recall documents about a - that were		·		
	18	request.		
Q So that was a function that the Office of 19 provided during a board meeting at which members				• -
	I			of the Oklahoma Water Resources Board and others
A It was — as custodian of records, 1: 21 did a tour. And I do believe all of those	ŀ			
worked with the Office of Attorney General, yes. 22 documents are provided. There may have been a				·
Q Did you — this Exhibit 3 contains both 23 Power Point presentation and a handout that was				· ·
24 request for production and interrogatories. Did 24 provided to the board members during that tour, if	i			· ·
25 you participate in the process of finding answers 25 that's the tour that's being referenced.	125	you participate in the process of finding answers	25	that's the tour that's being referenced.